

Your NPRM says:

“We believe that this proposal, if adopted, would (1) encourage individuals who are interested in communications technology, or who are able to contribute to the advancement of the radio art, to become amateur radio operators; (2) eliminate a requirement that we believe is now unnecessary and that may discourage amateur service licensees from advancing their skills in the communications and technical phases of amateur radio; and (3) promote more efficient use of the radio spectrum currently allocated to the amateur radio service.”

I believe:

(1) We already have a license class that does this; it's called the Technician Class. The only place that success comes before work is the dictionary and it's the same with amateur radio. The incoming hams need to spend some time at the local level, learning from those that have come before them, how to become good stewards of the resources and privileges granted to them.

(2) I feel that this will only encourage licensees to advance their skills in the communications and technical phases of amateur radio the same way that the elimination of licensing advanced the communications and technical phases of the Citizens Band radio service.

(3) By adding thousands of users to a limited spectrum, using phone and certain digital modes, you will in fact be promoting a less efficient use of the spectrum. This is the RF equivalent of trying to pour 10 gallons of crud into a 5 gallon pail.

In short, the decision to eliminate a telegraphy examination in order to qualify for any amateur radio operator license is in fact the wrong direction to take. We shouldn't be following the rest of the world, we should be leading and setting a standard to which other nations should strive to meet.

Lowering the bar will serve no one's best interests. I urge you to reconsider the elimination of telegraphy testing.